



July 11, 2025

The Honorable Judge Joel H. Slomsky
[Chambers of Judge Joel H Slomsky@paed.uscourts.gov](mailto:Chambers_of_Judge_Joel_H_Slomsky@paed.uscourts.gov)

**Re: April Ploeger v. The Trustees of the University of Pennsylvania,
E.D. Pa., No. 2:22-cv-02389-JHS
Request for Oral Argument on the Motion for Summary
Judgement**

Dear Judge Slomsky,

Pursuant to Local Rule 7.1(f) and this Court's Scheduling and Motion Policies and Procedures, Section IV, Plaintiff respectfully requests oral argument on Defendant's pending Motion for Summary Judgment.

The Court is faced with critical factual and legal disputes regarding Plaintiff's retaliation claims under the ADA and Title IX. Specifically, the parties dispute whether Defendant's stated non-retaliatory justifications are credible or are instead pretextual responses to Plaintiff's protected activity.

Given the importance of the issues and the complexity of the factual record (including Defendant's 103 paragraph Statement of Undisputed Material Facts, Plaintiff's detailed responses, and Defendant's significant admissions from its own Rule 30(b)(6) deposition testimony), oral argument would provide an important opportunity for the Court to question the parties directly and to ensure thorough consideration of the record. Oral argument would also allow the parties to address explicitly and succinctly any questions or concerns the Court may have regarding the voluminous evidentiary materials and applicable legal standards.

Plaintiff believes that a brief oral argument, no longer than one hour combined or so, would significantly assist the Court in resolving the pending Motion by clearly illuminating the critical factual disputes and legal issues at stake.

Accordingly, Plaintiff respectfully requests that the Court schedule oral argument on Defendant's Motion for Summary Judgment at the Court's earliest convenience. Particularly, if oral argument happened instead of the usual reply/surreply memos, those arguments could be more relevant to the issues the Court specifically finds important.

We appreciate Your Honor's consideration of this request.



Respectfully submitted,

s/ Mary Harris
Marty Harris, Esquire
Trial lawyer for April Ploeger